U.S. Application No. 10/665,312
Amendment and Response dated October 23, 2006
Response to Office Action dated July 26, 2006

REMARKS

In response to the Final Office Action mailed on July 26, 2006, the Applicants sincerely request reconsideration in view of the above amendments to the claims and the following remarks. The claims as presented are believed to be in allowable condition.

Claims 1-17 are currently pending in the present application and are rejected under 35 U.S.C. § 103. As shown above, claims 1, 9, 14, and 15 have been amended to clarify the claimed subject matter and to correct minor informalities. Claims 2 and 3 have been cancelled without prejudice or disclaimer. No new matter has been added.

Claim Rejections Under 35 U.S.C. §103

Claims 1-17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2003/0014447 to White (hereinafter *White*), in view of U.S. Patent No. 6,580,438 to Ichimura, *et al.* (hereinafter *Ichimura*) and in further view of U.S. Publication No. 2003/0030645 to Ribak, *et al.* (hereinafter *Ribak*). Claims 1, 9, 14, and 15 have been amended and Applicants respectfully submit that the amendments overcome this rejection and add no new matter.

Applicants' amended claim 1 recites a method for formatting objects in a page of an electronic document that includes, *inter alia*, "receiving an input for the page in the electronic document", "tracking a position of the input relative to the page", "calculating the position of an object in a style sheet", "comparing the position of the input to the position of the object with predefined formatting", "determining a format for the input based on the position of the corresponding object in the style sheet", and "applying the format to the input." The amendments are supported by the Specification (page 2, line 30 - page 3, line 3). Among other differences, *White, Ichimura,* and *Ribak* do not anticipate or teach these features of amended claim 1.

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According to claim 1, a position of the input relative to the page is tracked, a position of an object is calculated, a comparison between the positions of the input and the object is made to determine a format for the input, and the determined format is applied to the input. Even if *White*, *Ichimura*, and *Ribak* can be combined, their teachings are completely different from the features of Applicants' amended claim 1.

White discloses a data management system for generating customized versions of data documents, where the document is initially stored as in the form of raw data, which is subsequently parsed into an internal representation of the document (*White*: Abstract and par. 0009, 0010). According to *White*, a document generator includes a document manager that includes a document table and a transform table. The document table of *White* contains rows of document records that identify and are used to read raw data documents from the raw document database. Similarly, the transform table of *White* contains rows of transform records that identify and are used to read transforms from the transform database (*White*: Fig. 4 and par. 0066).

Ichimura discloses methods and systems to manipulate presentation elements to create a unified display characteristic between the elements selected for presentation. *Ichimura* further discloses "The stylizer applies the selected or custom style to the presentation element with the cooperation of controller. In particular, the stylizer compares the detected presentation element type to a presentation element attribute table..." (*Ichimura*: col. 6, lines 30-34).

Neither *White* nor *Ichimura*, alone or in combination, teach or suggest features of amended claim 1. For example, *White* and *Ichimura* fail to disclose tracking a position of the input relative to the page, calculating the position of an object in a style sheet, or comparing the position of the input to the position of the object with predefined formatting. In particular, the cited references do not teach or suggest determining a format for the input based on the position of the corresponding object in the style sheet.

Ribak discloses a method for visualizing data that includes receiving code representing content for display on the screen of a computer, the content including at least one hyperlink to

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other content and at least one attribute associated with the hyperlink (*Ribak*: Abstract and par. 0013). Specifically, *Ribak* teaches "an element in a document may have multiple hyperlinks of different types, each with its own verbosity characteristic. ... When the formatting styles conflict (as when different colors are used for different hyperlink types, for example), the document is preferably reformatted in order to resolve the conflict" (*Ribak*: Fig. 2A, 2B and par. 0043). *Ribak* teaches reformatting a document when formats conflict between the hyperlinks and the document. According to amended claim 1, an input (graphic or text) is formatted according to a position of an object from a style sheet associated with the electronic document. Thus, *Ribak* not only fails to teach or suggest features of amended claim 1 individually or in combination with the other two references, but *Ribak* teaches away from the claimed invention by suggesting the document be preferably reformatted in order to resolve a conflict between styles of an input and the document.

Therefore, none of *White, Ichimura,* or *Ribak* teach, disclose, or suggest each and every feature specified in amended claim 1. This claim is allowable and the rejection of this claim should be withdrawn. Claims 4-8 depend from amended independent claim 1 and are thus allowable for at least the same reasons discussed above with respect to claim 1. Notice to that effect is respectfully requested. Claims 2 and 3 have been cancelled without prejudice or disclaimer. Therefore, the rejection of these claims is moot.

Amended independent claim 9 is directed to a computer implemented method for controlling page formatting of an electronic document and recites, *inter alia*, "determining formatting of the input by tracking a position of the input relative to the page, calculating the position of an object in a sheet stored in a computer memory comprising objects with a predefined formatting, and comparing the position of the input to a position of the object, wherein at least one of the position and a type of the object in the sheet is used to determine the predefined formatting to be applied to the input for consistency with formatting within the electronic document." As discussed above in more detail, *White, Ichimura,* or *Ribak* fail to teach or suggest, individually or in combination, novel features of amended claim 9 such as tracking a

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position of the input relative to the page, calculating the position of an object in a sheet stored in a computer memory comprising objects with a predefined formatting, and determining formatting of the input by comparing the position of the input to a position of the object.

Thus amended claim 9 is in condition for allowance. Claims 10-13 depend from claim 9, and are thus allowable for at least the same reasons. Therefore, based on the foregoing, the rejection of claims 10-13 should also be withdrawn. Notice to that effect is respectfully requested.

Amended independent claim 14 is directed to a computer system for creating object in an electronic document that includes a processing unit responsive to a program module for, *inter alia*, "monitoring a position of input within an electronic document", "comparing the input to a style sheet for controlling a format of the electronic document based on one or more objects within the style sheet with predefined formatting, wherein a position and a type of an object in the style sheet is used to determine a format to be applied to the input for consistency with the format of the electronic document", and "formatting the input within the electronic document in response to identifying the format in the style sheet based on the corresponding position of the identified object in the style sheet relative to the position of the input in the electronic document." Again, *White, Ichimura*, or *Ribak* fail to teach or suggest, individually or in combination, novel features of amended claim 14 such as comparing the input to a style sheet for controlling a format of the electronic document based on one or more objects within the style sheet with predefined formatting, wherein a position and a type of an object in the style sheet is used to determine a format to be applied to the input for consistency with the format of the electronic document, and identifying the format in the style sheet based on the corresponding position of the identified object in the style sheet relative to the position of the input.

Thus, amended claim 14 is in condition for allowance for the reasons discussed above. Claims 15-17 depend from claim 14, and are thus allowable for at least the same reasons. Therefore, based on the foregoing, the rejection of claims 15-17 should also be withdrawn. Notice to that effect is respectfully requested.

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Applicants respectfully request that this Amendment After Final be entered by the Examiner, placing the claims in condition for allowance. Applicants respectfully submit that the proposed amendments of the claims do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicants respectfully submit that the entry of the Amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

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CONCLUSION

For at least the aforementioned reasons, the Applicants assert that the pending claims are in condition for allowance. The Applicants further assert that this response addresses each and every point of the Office Action, and respectfully requests that the Examiner pass this application to allowance. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact the applicant's undersigned attorney at the number below.

Respectfully submitted,

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